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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

TRUSTEES OF THE BRICKLAYERS &
ALLIEDCRAFTWORKERS LOCAL 13
DEFINEDCONTRIBUTION PENSION TRUST
FORSOUTHERN NEVADA; TRUSTEES OF
THE BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 HEALTH
BENEFITS FUND; TRUSTEES OF THE
BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 VACATION
FUND; BRICKLAYERS & ALLIED
CRAFTWORKERS LOCAL 13 NEVADA;
TRUSTEES OF THE BRICKLAYERS
&TROWEL TRADES INTERNATIONAL
PENSION FUND; TRUSTEES OF THE
BRICKLAYERS & TROWEL TRADES
INTERNATIONAL HEALTH FUND;
TRUSTEES OF THE INTERNATIONAL
MASONRY INSTITUTE,

Plaintiffs,

v.

PEGASUS MARBLE, INC., a Nevada
corporation; CYGNUS, LLC, a Nevada limited
liability company; GAGIK ZARGARYAN,
individually, and TOKIO MARINE HCC dba
AMERICAN CONTRACTORS
INDEMNITY COMP ANY, a California
insurance corporation.

Defendants.

Case No. 2:20-cv-00224-GMN-BNW

**STIPULATION TO EXTEND TIME TO FILE
REPLY TO DEFENDANTS' RESPONSE TO
MOTION FOR SUMMARY JUDGMENT**

[FIRST REQUEST]

**STIPULATION TO EXTEND TIME FOR PLAINTIFFS TO FILE REPLY TO DEFENDANTS'
RESPONSE TO MOTION FOR SUMMARY JUDGEMENT.**

[FIRST REQUEST]

The parties, by and through their respective counsels of record, hereby stipulate and request that this Court extend the deadline for Plaintiffs to file their Reply to Defendants' Response to Motion For Summary Judgement. The parties request an extension of only four (4) days from its currently set date of March 17, 2022. With the new deadline to be March 21, 2022.

Good cause exists for this extension of time due to the fact that the Plaintiffs' counsel is also preparing a settlement statement due in this case two days before the currently set Reply deadline. Plaintiffs' effort is served and the interest of judicial economy is served by focusing on the Settlement Conference Brief and potentially assisting in settlement of this matter. Allowing an extra four days, two of which are weekend days, will not greatly delay these proceedings.

As such, the Parties respectfully make this request to extend time in good faith and not for the purposes of undue delay of these proceedings.

IT IS SO STIPULATED

DATED this 13th day of March 2022

DATED this 13th of March 2022

**NOVARA TESIJA CATENACCI
MCDONALD & BAAS, PLLC**

LAW OFFICE OF DANIEL MARKS

/s/ Nathan R. Ring
NATHAN R. RING, ESQ.
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Attorney for Defendants

IT IS SO ORDERED.

Dated this 15 day of March, 2022.


Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

CERTIFICATE OF SERVICE

I CERTIFY THAT on the 13th day of March, 2022, I filed the above and foregoing
**STIPULATION TO EXTEND TIME TO FILE REPLY TO DEFENDANTS' RESPONSE TO
MOTION FOR SUMMARY JUDGMENT** via the Court's CM/ECF Filing System, which will send
notice to the following:

Adam Levine, Esq.
Law Office of Daniel Marks
610 S. 9th St.
Las Vegas, NV 89101
Counsel for Defendants

/s/ Nathan R. Ring